

**Exhibit A**

**Proposed Supplemental Seal Order**

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

|                                     |   |                         |
|-------------------------------------|---|-------------------------|
| -----X                              | : |                         |
| In re                               | : | Chapter 11              |
|                                     | : |                         |
| DPH HOLDINGS CORP., <u>et al.</u> , | : | Case No. 05-44481 (RDD) |
|                                     | : |                         |
| Reorganized Debtors.                | : | (Jointly Administered)  |
|                                     | : |                         |
| -----X                              |   |                         |

**SUPPLEMENTAL ORDER GRANTING EX PARTE MOTION  
FOR A SUPPLEMENTAL ORDER AUTHORIZING THE FILING  
OF REDACTED DOCUMENTS AND RELATED RELIEF**

This matter having come before the Court on the ex parte motion, dated October 16, 2013 (the "Motion"),<sup>1</sup> of the Reorganized Debtors seeking entry of an order, pursuant to section 107 of the Bankruptcy Code, 11 U.S.C. §§ 101 *et seq.*, and Bankruptcy Rule 9018, authorizing the Reorganized Debtors to file redacted forms of the Reply, the Declaration of John Brooks and "Exhibit A" thereto, and Exhibits 6, 7 and 8 to the Supplemental Declaration in support thereof; and this Court having jurisdiction over the Motion and the relief requested therein; and after due deliberation thereon; and good and sufficient cause appearing therefor, it is hereby

FOUND AND DETERMINED THAT:

A. This Court has jurisdiction over the Motion and the relief requested therein under 28 U.S.C. §§ 157(a) and 1334(b). This is a core proceeding under 28 U.S.C. § 157(b). Venue is proper under 28 U.S.C. §§ 1408 and 1409;

B. The proposed redacted information is confidential commercial information properly protected under section 107(b) of the Bankruptcy Code, and the

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<sup>1</sup> Capitalized terms used but not otherwise defined herein shall be ascribed the meanings provided in the Motion.

relief requested in the Motion is in the best interests of the Reorganized Debtors, their estates, their creditors and other parties in interest; now, therefor, it is hereby

ORDERED THAT:

1. The Motion is GRANTED to the extent set forth herein.
2. The Reorganized Debtors are authorized to file a redacted version of (i) the Reply, as set forth in the Motion, to conceal commercially sensitive information relating to the Funding Agreement (including information already filed under seal), (ii) the Declaration of John Brooks and "Exhibit A" thereto, and (iii) Exhibits 6 ("highly confidential" declaration in support of the Modified Plan), 7 ("highly confidential" declaration in support of the Modified Plan) and 8 (amendment to the Funding Agreement) to the Supplemental Declaration. DPH may serve an unredacted version of the Reply and all exhibits thereto, and the Declaration of John Brooks and all exhibits thereto, with a copy of this Order, on the U.S. Trustee and New GM, with a copy to the Court's Chambers.
3. All parties who receive the unredacted Reply and the exhibits thereto, and the Declaration of John Brooks and all exhibits thereto, shall maintain the confidentiality of the redacted portions thereof that are, in fact, confidential, subject to further order of the Court.
4. Documents filed in response to the Reply, if any, that refer to or quote provisions of the redacted or sealed documents shall also be filed under seal (with redacted copies to be filed on the docket), with unredacted versions of those documents to be provided to the Court, the U.S. Trustee, the Reorganized Debtors and, if applicable, New GM.
5. The Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Order.

6. Entry of this Order is without prejudice to the right of any party in interest seeking relief from this Order upon written application on notice to the Reorganized Debtors, New GM, the U.S. Trustee and such other parties entitled to receive notice under the Case Management Orders.

Dated: White Plains, New York  
October \_\_, 2013

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HONORABLE ROBERT D. DRAIN  
UNITED STATES BANKRUPTCY JUDGE